



Revised May 17, 2011

**Amended PCB Caulking Removal Plan:
City Square**

AMENDMENTS TO PCB CAULKING REMOVAL PLAN

INTRODUCTION:

NASDI, LLC, is further clarifying its method of removal of PCB caulking and associated concrete.

The following is the clarification of the procedures:

CLARIFICATION:

The original work plan stated:

"Option 2: Saw Cutting

Saw cutting of concrete shall be used based on type of material (i.e. expansion joints) and will take place a few inches off of material and if possible at an angle to allow for ease of removal of caulking with some of concrete. This method will be used in most situations as caulking cutters only viable on wide expansion joints.

Once all caulking is removed rags with Simple Green shall be used to wipe concrete surface to prepare for visual inspection. In the event of a failing confirmatory test, under authorization from the Owner and the direction of the on-site URS representative, NASDI will perform additional concrete cutting beyond the original removal limits. Scarification methods will not be used."

To further clarify, pneumatic hammers are being used to remove the loose concrete and caulking. The hammers are used only on the pre-cut concrete adjacent to the caulking (and not on the caulking itself) to loosen up pre-cut concrete. NASDI has been informed the concrete is not contaminated with PCB's. Pre-cutting and hammering the non-PCB concrete adjacent to the caulking is allowing for the PCB caulking to be removed in intact sections. Caulking removed from the floor work is taking place on is immediately placed into a lined container, which is located inside the garage at the south end on level two or drummed; not stored on poly.

In order to prevent migration of PCB caulking debris, concrete debris, and concrete dust, NASDI will cover the work area beneath the expansion joint with polyethylene sheeting and place the bucket of the bobcat directly under the expansion joint that is to be removed. The mini excavator, equipped with a pneumatic hammer will push the pre-cut slab and expansion joint from the floor above down into the bobcat bucket. The resulting debris will be dumped through an opening in the floors, created by NASDI, directly into the lined container. These openings will be shrouded with poly and plywood (at the base of the opening) to contain potential dust and debris from spilling onto the floor the debris is passing through. The installation of polyethylene enclosures at the expansion joints was utilized in the center core work area as there were other trades working adjacent to the caulking removal procedure. As the south area will be completely segregated from other trades and contained at the perimeter, separate enclosures at the expansion joints will not be installed. All caulking and associated concrete debris that falls to floor below is promptly cleaned from poly and disposed as PCB waste, including the poly.

In summary, hopefully this will clarify procedures for removal of concrete after saw cutting; pneumatic hammers are used to remove loose material. Any questions please let me know.

Submitted By: Michael F. Tibert

Director of Environmental Health & Safety